



UNITED STATES MARINE CORPS

MARINE CORPS BASE
3250 CATLIN AVENUE
QUANTICO VIRGINIA 22134 5001

MCBO 5090.2D

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JUN 09 2013

MARINE CORPS BASE ORDER 5090.2D

From: Commander

To: Distribution List

Subj: ENVIRONMENTAL PROGRAM MANAGEMENT

Ref (a) MCO P5090.2A (w/ Ch 2)
(b) MCBO 4100.1B
(c) MCBO 5090.1B
(d) MCBO 5090.3
(e) MCBO 5090.4
(f) MCBO 5090.5
(g) MCBO 5090.6
(h) MCBO 6240.1B
(i) MCBO 6240.2A
(j) MCBO 6240.4B
(k) MCBO 6280.1B
(l) MCBO 6280.4
(m) MCBO P8023.1
(n) MCBO 8027.1A
(o) MCBO 11015.1B
(p) MCBO 11015.3A
(q) MCBO 11015.4

Encl: (1) MCBQ Environmental Management System Manual

1. Situation. In accordance with MCO P5090.2A (w/ Ch 2), Marine Corps Base Quantico (MCBQ) (also referred to as "the Base") employs a proactive Environmental Management System (EMS) to protect and enhance the quality of the environment through strict compliance and conformance with all applicable environmental requirements. MCBQ protects and preserves its watersheds, wetlands, natural landscapes, soils, forest, fish and wildlife, and other natural resources as vital Marine Corps assets. The EMS Manual at enclosure (1) provides the framework associated with the implementation and operation of the EMS aboard MCBQ.

DISTRIBUTION STATEMENT A: Approved for public release;
distribution is unlimited.

2. Cancellation. MCBO 5090.2C; Environmental Compliance and Protection.

3. Mission. This Order provides policy for the operation and management of the Base Environmental Management System. This document has undergone significant revisions and should be reviewed in its entirety.

4. Execution

a. Commander's Intent. The Commander's intent is fully defined in the Base Commander's Environmental Policy Statement, which applies to all MCBQ staff sections, subordinate commands, other United States Marine Corps organizations aboard MCBQ, as well as tenant commands of the Base (collectively referred to herein as "activities"); unless otherwise exempted in the EMS Manual. References (a) thru (q)) provide additional guidance for environmental and natural resources management on board MCBQ, as supplemental execution activities to this order.

b. Concept of Operations. The EMS Manual at enclosure (1) accomplishes the following:

1) Establishes the overall framework associated with the implementation and operation of MCBQ's EMS.

2) Provides for key environmental roles and responsibilities for the Base and tenant command staff personnel.

3) Institutes the use of MCBQ's Environmental Compliance and Protection Standard Operating Procedure (ECPSOP), which is considered a publication requirement of this order and is signed by the Base Commander and updated every 3 years at a minimum.

4) Institutes the use of Environmental Media Program Management Plans (Program Plans). These plans are to be considered a publication requirement of this order, and signed by the Base Commanding Officer and updated every three years or as required by regulatory changes.

5) Institutes the use of specific Environmental Media Base Orders when greater accessibility or amplifying guidance is deemed necessary by the Base Commanding Officer.

6) Institutes the use of Environmental Standard Operating Procedures (ESOP), which are designed to provide detailed instructions on the execution of significant environmental practices to mitigate potential environmental impacts. When deemed necessary, these ESOPs are to be considered a publication requirement of this order and shall be signed by the Chairperson of the Energy and Environmental Management System (E²MS) Implementation Team and updated every three years or as required by regulatory changes.

5. Administration and Logistics. Recommendations concerning the contents of this Order may be forwarded to the MCBQ Commanding Officer via the Natural Resources and Environmental Affairs (NREA) Branch.

6. Command and Signals. Reviewed and approved this date.

a. Command. This Order is applicable to all MCBQ Activities

b. Signal. This Order is effective the date signed.

6/9/2013

X David W Maxwell

DAVID W. MAXWELL

Signed by: MAXWELL.DAVID.WAYNE.1163568108

Distribution: A

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ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL



April 2013

Enclosure (1)

MCBQ EMS Manual

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MCBQ EMS Manual
Log of completed change action as indicated.

Change Number	Date of Change	Date Entered	Signature of Person Incorporated Change

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Figure 4. EMS Organizational Interaction

Figure 5. Interaction of EMS Documents

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Table 1. Primary MCBQ EMS Documents

Table 2. E²MS Core Team Organization

Table 3 E²MS Implementation Team Organization

Table A-1. Summary of EMS Elements

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1. Scope

The mission of Marine Corps Base Quantico (MCBQ) is "Enhance readiness by providing operational and training support, infrastructure, and community services that are responsive to tenant command and activity requirements and the needs of our military members, families, and civilians.

This manual provides the specific requirements for the operation and management of the Environmental Management System (EMS) for MCBQ. As a management tool, the EMS Manual provides a framework for commanders, directors, and supervisors at MCBQ to use while ensuring compliance with environmental requirements. The EMS is an integral part of the overall command management structure for MCBQ.

The framework of the MCBQ's EMS is based on the EMS Elements of the United States Marine Corps (USMC) EMS structure specified in Chapter 2 of Marine Corps Order (MCO) P5090.2A (W/ CH 2), Environmental Compliance and Protection Manual. The section numbering in this manual is based on the International Organization for Standardization (ISO) 14001 Standard for Environmental Management Systems- Requirements with Guidance for Use standard. Consideration was given also to the draft version of MCO P5090.2B, where the projected revisions bring the elements into full conformance with the Elements provided by the ISO 14001 Standard. This manual is intended to establish the overall framework of MCBQ's EMS while also provided a means of executive level general awareness.

Procedures for the management of MCBQ's environmental programs are further established by the Environmental Compliance and Protection Standard Operating Procedure (ECPSOP), Specific Environmental Media Program Management Plans (Program Plans) (e.g., Tank Plan, Pollution Prevention Plan, etc.), Specific Environmental Media Base Orders (Base Orders), and Environmental Standard Operating Procedures (ESOPs), in order to mitigate potential environmental impacts caused by the execution of significant practices. Specific EMS-related administrative procedures are provided in the MCBQ Management Coordination Plan (MCP). The MCP is the detailed management plan that provides administrative procedures for implementing and maintaining the EMS and is maintained by the EMS Coordinator.

EMS Elements are the structural framework through which the USMC establishes and reviews its environmental goals, analyzes

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its environmental impacts and legal requirements, sets environmental objectives and targets, establishes programs to meet these objectives and targets, and continuously monitors, measures, and reviews the progress of the EMS. Appendix A, Table A-1 provides a summary of EMS elements and Figure A-1 depicts how EMS Elements relate between MCO P5090.2A (W/ CH 2), Draft MCO P5090.2B, and the ISO 14001:2004 standard. In turn, the ISO 14001:2004 standard is based on the management philosophy known as Plan-Do-Check-Act (PDCA). Refer to Figure 1, for a description of the PDCA cycle.

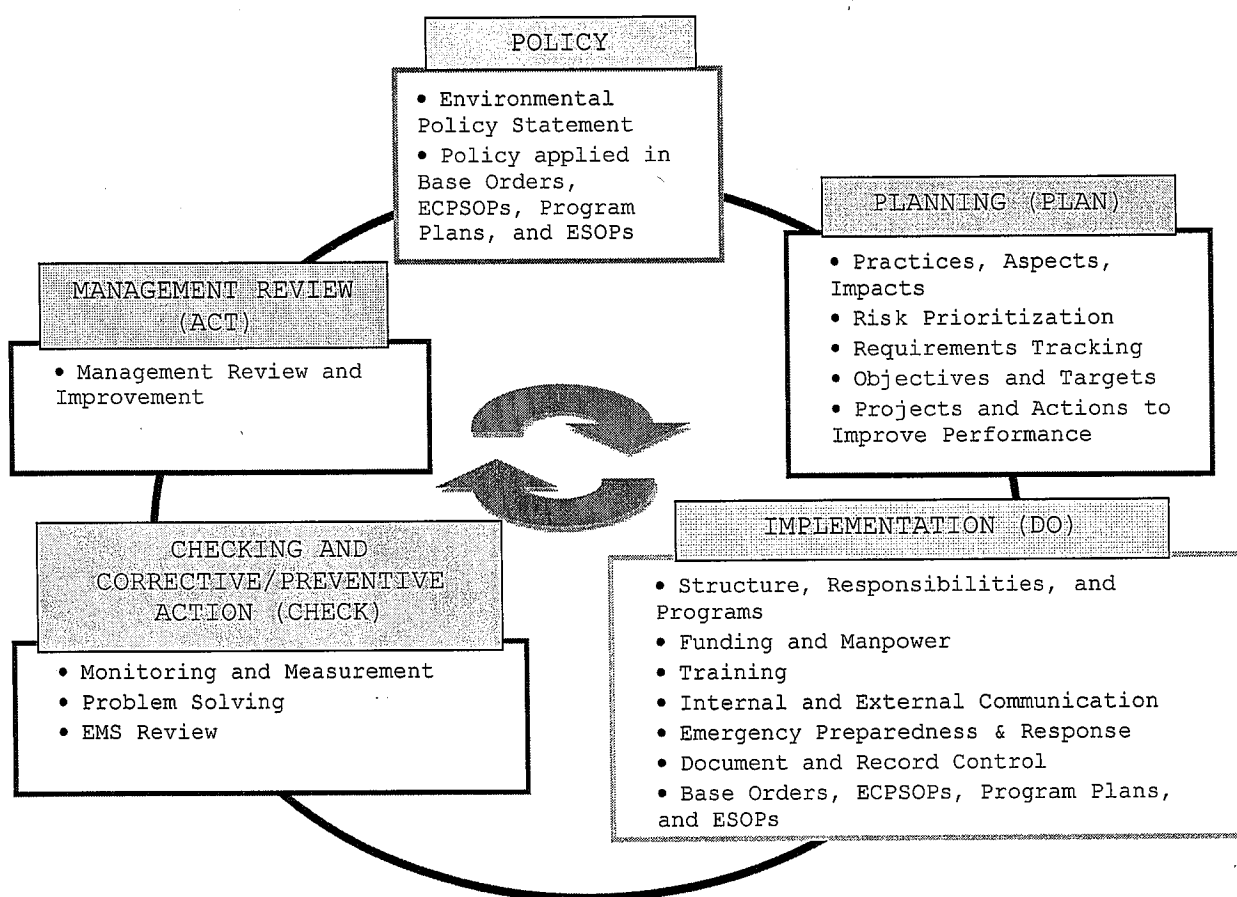


Figure 1. PDCA Process within the EMS.

The scope of MCBQ's EMS includes areas used and affected by all activities (e.g., tenants, commands, units, etc.) aboard MCBQ unless otherwise exempted by the Base Commander.

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As of publication of this EMS Manual, the following organizations have been exempted by the Base Commander: Federal Bureau of Investigation (FBI), Drug Enforcement Agency (DEA), and Lincoln Military Housing (LMH). These agencies must maintain their own EMS and shall comply with Federal, Commonwealth of Virginia, local, and Department of Defense (DoD) regulatory compliance requirements.

2. References

- a. Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance, 5 October, 2009. Executive Order reaffirms EMS mandate.
- b. Executive Order 13423 Strengthening Federal Environmental, Energy, and Transportation Management 24 January, 2007. Executive Order that mandates an EMS.
- c. ISO 14001:2004(E), Environmental Management Systems - Requirements with guidance for use. Established the international standard for an EMS.
- d. MCO P5090.2A (w/ Ch 2), Environmental Compliance and Protection Manual, 21 May 2009. The USMC Environmental Requirements Document, loosely based on ISO 14001:2004.
- e. MCO P5090.2B (Draft), Environmental Compliance and Protection Manual May 2012. Will fully align the USMC Environmental Requirements Document with ISO 14001:2004.
- f. The Environmental Assessment and Management (TEAM) Guide, U.S. Army Corps of Engineers, Engineer Research and Development Center. The TEAM Guide is periodically updated for United States (quarterly), State of Virginia (annually), and U.S. Marine Corps (quarterly) laws, regulations, and requirements.

3. Acronyms, Abbreviations, Terms, and Definitions

CETEP - Comprehensive Environmental Training and Education Program
DoD - Department of Defense
DEA - Drug Enforcement Agency
ECE - Environmental Compliance Evaluation
ECPSOP - Environmental Compliance and Protection Standard Operating Procedure
EC - Environmental Coordinator

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E²MS - Environmental and Energy Management System
EMS - Environmental Management System
ESOPs - Environmental Standard Operating Procedures
FBI - Federal Bureau of Investigation
ISO - International Organization for Standardization
ISMP - Integrated Spill Management Plan
LMH - Lincoln Military Housing
MCP - Management Coordination Plan
MCBQ - Marine Corps Base Quantico
MCO - Marine Corps Order
PDCA - Plan-Do-Check-Act
TEAM - The Environmental Assessment and Management Guidelines
USMC - United States Marine Corps

Terms and Definitions are provided in Appendix B.

4. Environmental Management System Requirements

4.1 General Requirements

MCBQ shall establish, document, implement, maintain and continually improve an environmental management system in accordance with the requirements of MCO P5090.2A (w/ Ch 2), Environmental Compliance and Protection Manual.

4.2 Environmental Policy

The Base Commander, with the assistance of the E²MS Core Team (see paragraph 4.4), establishes the Base Environmental Policy that conforms with Element 1, Environmental Policy Statement, within MCO P5090.2A (W/ CH 2). The Commander ensures that the policy:

- a. Is appropriate to the nature, scale and environmental impacts of the activities at MCBQ;
- b. Reflects the USMC's EMS vision to sustain and enhance mission readiness and provide access to training environments through effective and efficient environmental management;
- c. Includes a commitment to continual improvement and prevention of pollution;
- d. Includes a commitment to conserve natural and cultural resources, to clean up contaminated sites, and minimize risks to mission;

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- e. Includes a commitment to comply with applicable legal requirements and with other requirements to which MCBQ subscribes that relate to its environmental aspects;
- f. Provides the framework for setting and reviewing environmental objectives and targets;
- g. Is documented, implemented and maintained;
- h. Is communicated to all persons working for or on MCBQ; and,
- i. Is available to the public.

Communication of the Base Environmental Policy is accomplished through the preparation and mass distribution to all activities on MCBQ. The Base Environmental Policy is made available to the public through the MCBQ Web Site under G-5 Natural Resource and Environmental Affairs Branch and through the NREA Branch SharePoint Site, Shared Documents Libraries under each program area.

The policy is reviewed annually by the E²MS Core Team and the Base Commander. It is updated when needed or in the event of a Change of Command.

For MCBQ, the actual execution of the Commander's Environmental Policy is accomplished through the publication of this manual, the ECPSOP, Program Plans, Base Orders, and Significant Practice ESOPs. Refer to Figure 2 for a description of how the Environmental Policy is applied to all environmental management documents at MCBQ. Primary MCBQ EMS Documents are further described in Table 1. These documents are provided on the MCBQ Web Site and SharePoint Site mentioned above.

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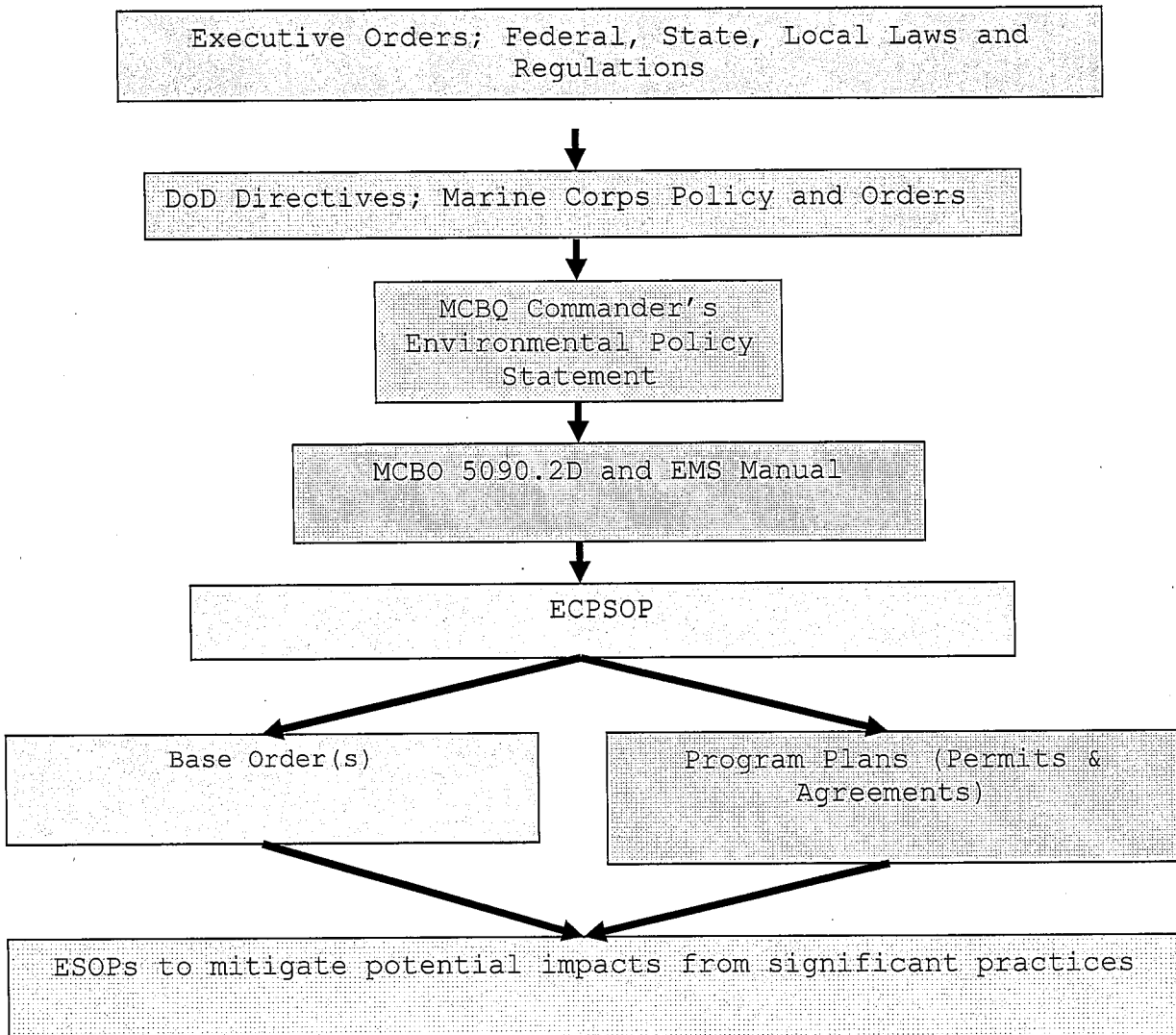


Figure 2. Environmental Policy link across EMS Documents

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Table 1. Primary MCBQ EMS Documents

Document	Approval Level
Environmental Policy Statement <ul style="list-style-type: none"> • Establishes MCBQ's overall Environmental Policy • Intended for all Base personnel 	Approved by the MCBQ Commander
MCBO 5090.2D and EMS Manual <ul style="list-style-type: none"> • Expands Environmental Policy for specific topics that warrant additional command validation. • Used by commanders, directors, and supervisors to authorize elements of the EMS. • Establishes EMS framework and document Element relationships. 	Approved by the MCBQ Commander
ECPSOP <ul style="list-style-type: none"> • Required by MCO P5090.2A (w/ Ch 2) and MCBO 5090.2D. • Provides detailed environmental policy for specific environmental media program areas at MCBQ. • Provides procedures for commanders, directors, supervisors, Environmental Coordinators (ECs), and program managers. 	Approved by the MCBQ Commander
Program Plans / Base Orders <ul style="list-style-type: none"> • Established and authorized by MCO P5090.2A (w/ Ch 2). • The use of specific plans are established within the MCBQ ECPSOP, when needed, to provide for better program management and document control; and thus by relation are required by MCBO 5090.2D/EMS Manual. • Provides detailed operational level environmental procedures for commanders, directors, ECs, Program Managers, and practice owners. 	Approved by the MCBQ Commander
ESOPs <ul style="list-style-type: none"> • Expands upon specific procedural requirements established by Base Orders, ECPSOP, and Plans. • Aligns procedures to specific environmental practices identified as "Significant" risk on MCBQ. • Already authorized by the MCBQ Base Commander. • Intended to provide procedures in layman's terms for ECs, practice owners, and practice workers with "Significant" Practices. 	Approved by the E ² MS Implementation Team Chairperson

4.3 Planning

4.3.1 Environmental Aspects

The USMC has established Element 3, Practices, Aspects, and Impacts and Risk Prioritization, within MCO P5090.2A (w/ Ch 2). Procedures for determining MCBQ's practices, aspects, and impacts are provided in the MCP. The MCP seeks to:

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a. Identify the active practices on board MCBQ and their associated aspects/ impacts within the defined scope of the EMS; while taking into account planned or new developments, or new or modified activities.

b. Specific to MCBQ's practices, determine aspects that have or can have an impact(s) on key physical environmental resources, which include the Base's land, air, water, cultural, and natural resources.

The MCP includes a procedure for inventorying practices and updating the inventory as necessary. Aspects and impacts are also associated with each practice on the inventory.

MCO P5090.2A (w/ Ch 2) includes Element 4, Risk Prioritization. The risk analysis provides an assessment of each resource's vulnerability to the aspects of existing and new practices. The MCP includes the procedure to prioritize practices based on risk to mission that is repeatable and defensible.

Risk scoring is conducted for each aspect. There are six categories assessed and rated as part of risk ranking: Environmental Risk, Regulatory Risk, Public Perception Risk, Health & Safety Risk, Frequency, and Mission Sensitivity Rank. The MCP also includes a schedule for periodic review and update of the prioritization results in addition to procedures to mitigate risk (i.e., development of operational controls). Results of risk scoring and ranking are provided to the E²MS Implementation Team for review and are updated, based upon feedback.

Figure 3 depicts how practices, aspects, and impacts interact with the mission of MCBQ. The primary role of MCBQ's EMS is to mitigate, if not eliminate, potential impacts to the mission associated with operational practice owners and environmental aspect program areas.

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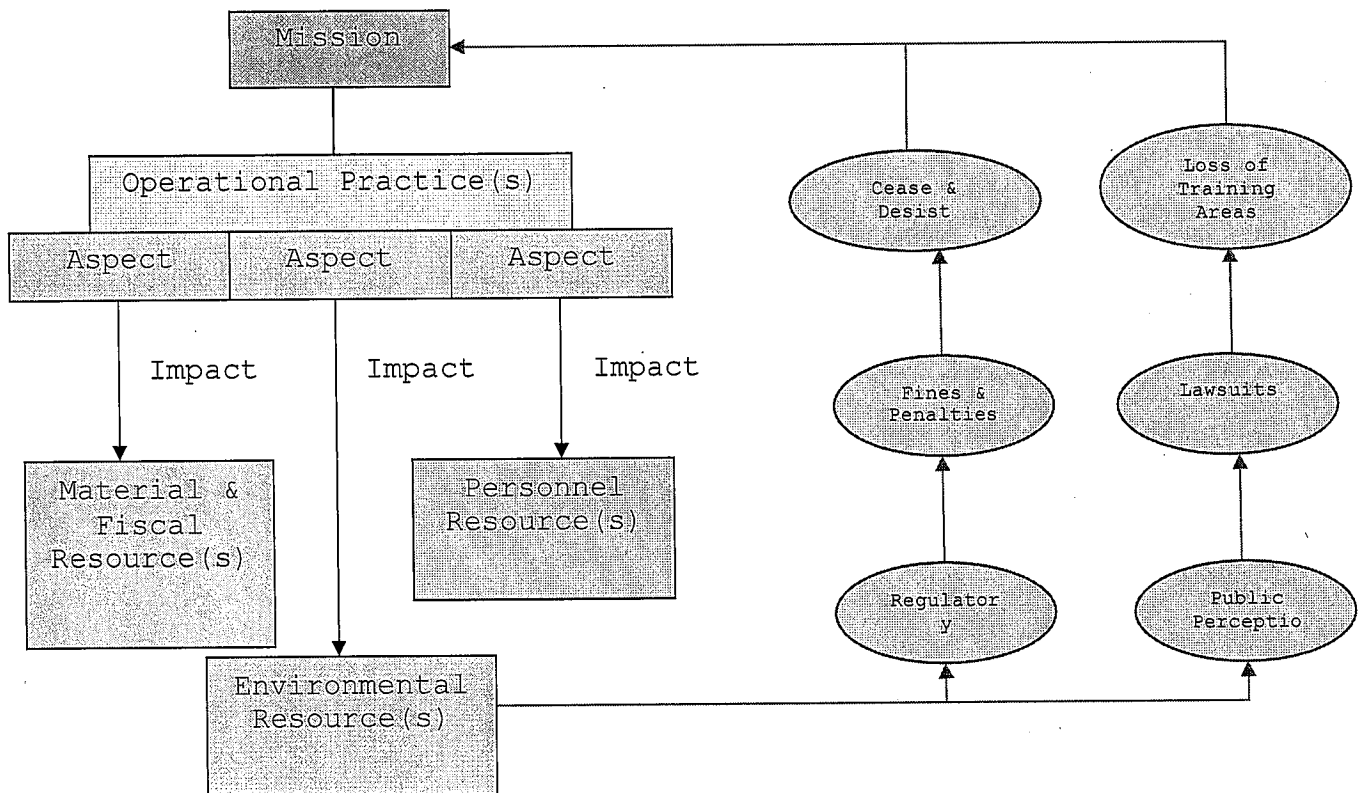


Figure 3. Environmental Practices, Aspects, and Impacts Potential Interaction with MCBQ Mission.

4.3.2 Legal and Other Requirements

In conformance with MCO P5090.2A (w/ Ch 2), Element 2, Requirements; the MCP includes the procedure required to:

- a. Identify and access applicable environmental legal requirements and other requirements related to environmental aspects, and
- b. Determine how these requirements apply to MCBQ's environmental aspects.

Conformance with the procedure ensures that applicable environmental legal requirements and other requirements are taken into account in establishing, implementing, and maintaining MCBQ's EMS.

4.3.3 Objectives, Targets and Programs

MCBQ has established, implemented and maintains documented environmental objectives and targets, at relevant functions and levels in accordance with Element 5, Environmental Objectives and Targets, and Element 6, Actions to Improve Performance, of MCO P5090.2A (W/ CH 2).

Objectives and targets are measurable, where practicable, and consistent with the Base Environmental Policy, including the commitments to prevention of pollution, to compliance with applicable legal requirements and with other requirements, and to continual improvement. Objectives and targets reflect risks to mission determined through prioritization of practices and aspects. General Base Objectives are published within the Base Commander's Environmental Policy Statement.

The MCP provides for establishment, implementation, and maintenance of the program specific objectives and targets to meet the General Base Objectives, via Plan(s) of Action and Milestones (POA&M) and Environmental Action Plans (EAP). The programs include:

- a. Designation of responsibility for achieving objectives and targets at relevant functions and levels of the organization, and
- b. The means and time-frame by which they are to be achieved.

When establishing and reviewing its objectives and targets, considers its aspects as well as its legal requirements and other requirements, and its significant environmental aspects. MCBQ also considers its technological options, its financial, operational and business requirements, and the views of interested parties.

4.4 Implementation and Operation

4.4.1 Resources, Roles, Responsibility and Authority

MCB P5090.2A (w/ Ch 2) establishes the requirement for Element 7 (Structure, Responsibility, and Programs) and Element 8 (Funding and Manpower). The Base Commander ensures the availability of resources, in accordance with MCO P5090.2A (w/ Ch 2) Chapter 3, that are essential to establish, implement,

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maintain and improve the EMS. Resources include human resources and specialized skills, organizational infrastructure, technology, and financial resources.

Roles, responsibilities and authorities are defined, documented, and communicated in order to facilitate effective environmental management through MCO P5090.2A (w/ Ch 2), this EMS Manual, ECPSOP, Program Plans, Base Orders, and Environmental Standard Operating Procedures.

Specific management representatives are identified, irrespective of other responsibilities. These representatives have defined roles, responsibilities and authority for:

- a. Ensuring that an EMS is established, implemented and maintained in accordance with the requirements of MCO P5090.2A (w/ Ch 2),
- b. Reporting to top management on the performance of the EMS for review, including recommendations for improvement.

The key roles and authorities are established and specific responsibilities are documented within the MCP, ECPSOP, other Base Orders, and Program Plans as approved by the Base Commander. Figure 4 provides an outline of how the key roles and authorities interact within the MCBQ EMS.

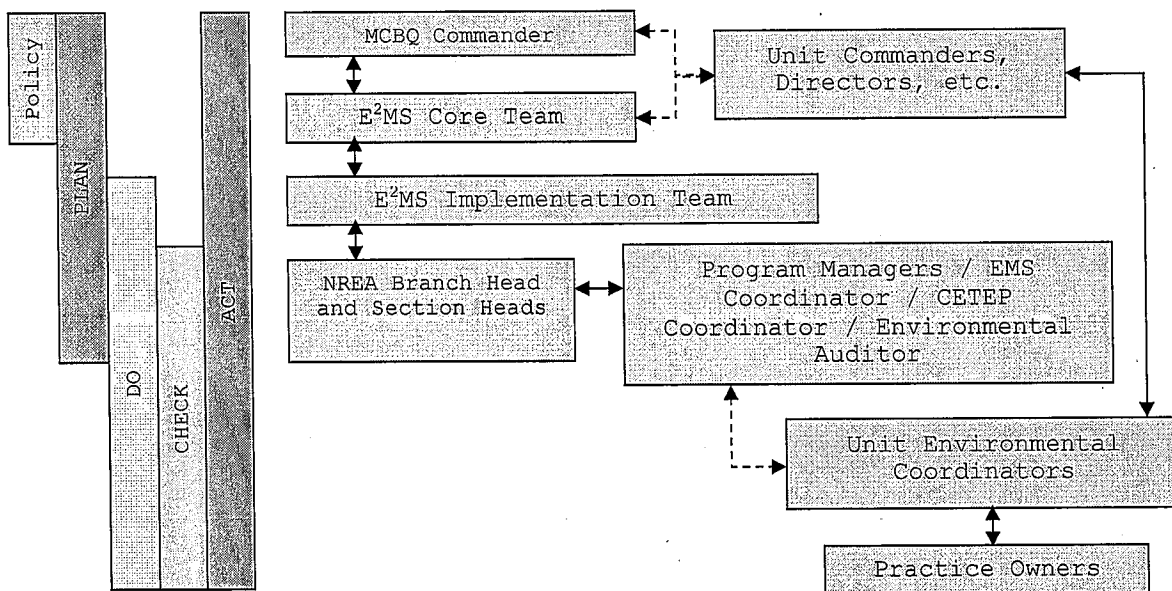


Figure 4. EMS Organizational Interaction

The key roles and authorities indicated in Figure 4 are summarized below. The selection of individuals to fill specific employment assignments, unless revoked or re-assigned by the MCBQ Base Commander, is also assumed to have delegated authority to accomplish the appropriate duties necessary to maintain the EMS.

a. Commander, MCBQ: EMS Senior Executive/Core Team Chairperson.

b. Unit Commanders, Directors, and Supervisors. These individuals must appoint a Unit EC and an Alternate EC by letter. They must also provide resources necessary to maintain compliance for the environmental practices associated with the Unit.

c. Head, Natural Resources and Environmental Affairs (NREA) Branch: This individual coordinates EMS responsibilities and maintains EMS records. He/She facilitates the E²MS Core Team meetings and leads the E²MS Implementation Team meetings. The Head, NREA Branch also coordinates requests for resources necessary to maintain MCBQ's EMS, achieves and maintains compliance/conformance objectives, and provides for process improvement.

d. Section Heads, NREA Branch: These individuals coordinate MCBQ EMS responsibilities and maintain EMS records appropriate for the various programs within their Sections. They also coordinate requests for resources necessary to maintain MCBQ's EMS, achieve and maintain compliance/conformance objectives, and provide for process improvement within their Sections.

e. Specific Environmental Media Program Managers (Program Managers): These individuals coordinate EMS responsibilities and maintain EMS records appropriate for their programs. They initiate requests for resources necessary to maintain their program areas; achieve and maintain compliance/conformance objectives; and, provide for process improvement within their program areas. Program Managers develop and maintain base orders and Program Plans within their program areas. They review ECPSOP Chapters and ESOPs associated with their program areas that are developed by the EMS Coordinator. Program Managers interact with unit commanders, directors, managers, ECs, practice owners to ensure compliance/conformance with all approved procedures associated with their program areas.

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f. EMS Coordinator: This is an assigned position as required by MCO P5090.2A (w/ Ch 2), Chapter 5. The billet is located within the NREA Branch. The EMS Coordinator provides administrative and technical support to the EMS Senior Executive; E²MS Core Team Chair; Head, NREA Branch; NREA Branch Section Heads; and Program Managers to ensure conformance with the EMS. Specific duties of the EMS Coordinator are provided in the MCP. The selection of an individual to fill the specific employment assignment as the EMS Coordinator, unless revoked or re-assigned by the Base Commander, is also assumed to have delegated authority to carry out the appropriate duties necessary to maintain the EMS.

g. Comprehensive Environmental Training and Education Program (CETEP) Coordinator. This is an assigned position as required by MCO P5090.2A (w/ Ch 2), Chapter 5. The billet is located within the NREA Branch. The CETEP Coordinator provides environmental training and educational support to the EMS Senior Executive, E²MS Core Team Chair; Head, NREA Branch; NREA Branch Section Heads, and Program Managers to ensure conformance with the EMS. Specific duties of the CETEP Coordinator are provided in the CETEP Plan. The selection of an individual to fill specific employment assignment as the CETEP Coordinator, unless revoked or re-assigned by the Base Commander, is also assumed to have delegated authority to carry out the appropriate duties necessary to maintain the CETEP.

h. Environmental Auditor. This individual, assigned by the Head, NREA Branch, will perform the MCBQ's internal Environmental Compliance Evaluations (ECEs) and EMS Conformance Audits, in accordance with MCO P5090.2A (w/ Ch 2), Chapter 4 and the Environmental Audit Chapter of MCBQ's ECPSOP.

i. ECs. All activities onboard MCBQ are required to designate an individual as an EC who performs as liaison between their organization, NREA Branch, and Energy and Water Conservation Programs. EC duties and requirements are described in MCBQ's MCP. Unit ECs also coordinate unit level resource requirements necessary to maintain compliance within environmental practice areas.

j. Practice Owners. These individuals are responsible for ensuring their unit or shop follows procedures (i.e., ESOPs), policies, and E²MS guidance in order to reduce the risks of their practices and to meet regulatory requirements, mandates, and

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orders. Practice owners also identify resource needs associated with a practice area to their Unit ECs.

k. E²MS Core Team. This team provides Senior Management leadership and review of policies and objectives for MCBQ's EMS Program and Energy and Water Conservation Program. The Core Team's mission is to provide senior oversight and endorsement of E²MS goals and objectives that are established to aid MCBQ's E²MS performance by addressing environmental and energy compliance and conformance requirements. The E²MS Core Team Membership is provided in Table 2. Membership is listed by billet title.

Table 2. E²MS Core Team Organization

Chair, E ² MS Core Team	Commander, MCBQ
	Chief of Staff, MCBQ (Alternate)
E ² MS Core Team	Sergeant Major, MCBQ
	Assistant Chief of Staff, G-1 Manpower Division
	Assistant Chief of Staff, G-3 Operations Division
	Assistant Chief of Staff, G-4 Logistics Division
	Assistant Chief of Staff, G-5 Installation and Environment Division
	Assistant Chief of Staff, G-6 Communications Division
	Director, Public Affairs Office
	Commanding Officer, Naval Health Clinic Quantico
	Director, Safety Division
	Office of Counsel
	Director, Marine Corps Community Services
	Director, Business Performance Office

1. E²MS Implementation Team. This team provides subject matter expert review of all E²MS procedures, recommends objectives to the E²MS Core Team for approval, and is typically assigned corrective actions (i.e., Environmental Action Plans) by the E²MS Core Team to improve the Base's E²MS. The E²MS Implementation Team consists of stakeholders involved in the management and implementation of environmental, energy, and overall sustainability goals and objectives. Resource requirements are coordinated through E²MS Implementation Team. Table 3 describes the membership of the E²MS Implementation Team, by billet title.

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Table 3 E²MS Implementation Team Organization

Chair, E ² MS Implementation Team	Head, NREA Branch
	Deputy, NREA Branch (Alternate)
E ² MS Implementation Team	Head, Compliance Section, NREA Branch
	Air Program Manager, NREA Branch
	Hazardous Waste Program Manager, NREA Branch
	Pollution Prevention Program Manager, NREA Branch
	Water Programs Manager, NREA Branch
	Storage Tank Program Manager, NREA Branch
	Solid Waste Program Manager, NREA Branch
	Head, Environmental Planning Section, NREA Branch
	EMS Coordinator, NREA Branch
	Remediation Program Manager, NREA Branch
	CETEP Coordinator, NREA Branch
	Head, NEPA Program, NREA Branch
	Cultural Resources Program Manager, NREA Branch
	Noise Program Manager, NREA Branch
	Head, Natural Resources Section, NREA Branch
	Forestry Program Head, NREA Branch
	Fish, Wildlife, and Agronomy Program, NREA Branch
	Conservation Law Enforcement Program
	Head, Environment Audit Section, NREA Branch
	Energy Program Manager, Public Works Branch
	Associate Counsel, Environmental and Land Use
	Representative, Naval Health Clinic Quantico
	Head, G-1 Manpower Branch
	Deputy Director, G-3 Operations Division
	Operations Officer, G-4, Logistics Division
	Representative, Regional Contracting Office
	Facilities Director, Marine Corps Community Services

4.4.2 Competence, Training and Awareness

MCO P5090.2A (w/ Ch 2) Chapter 5 and Element 9, Training, establishes a Comprehensive Environmental Training and Education Program (CETEP). The CETEP Plan provides procedures that address competence on the basis of appropriate education, training or experience. Competence is required for all persons performing tasks for MCBQ, or on its behalf, which have the potential to cause a significant environmental impact. The CETEP Coordinator, ECs, and trained individuals retain associated competence records.

The CETEP Plan identifies training needs associated with the environmental aspects and the MCBQ's EMS. The CETEP Coordinator provides training or takes other action to meet these needs, and retains associated records.

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MCBQ has established, implemented, and maintains procedures within the CETEP Plan to make persons working for MCBQ or on its behalf aware of:

- a. The importance of conformity with the Base Environmental Policy and MCBQ's EMS,
- b. Significant environmental aspects and related actual or potential impacts associated with their work,
- c. Environmental benefits of improved personal performance,
- d. Personnel roles and responsibilities in achieving conformity with the requirements of MCBQ's EMS; and,
- e. Potential consequences of departure from specified procedures.

4.4.3 Communication

In accordance with MCO P5090.2A (w/ Ch 2), Element 10, Communications, with regard to the MCBQ environmental aspects and EMS, the Base has established, implemented and maintains a procedure within the MCP for:

- a. Internal communication among the various levels and functions of the organization,
- b. Receiving, documenting and responding to relevant communication from external interested parties.

The Base Commander has decided not to communicate externally about MCBQ's significant environmental aspects. If a decision is made to externally communicate at a later date, the Base Commander shall establish and implement a method(s) for external communication within the MCP.

4.4.4 Documentation

EMS documentation conforms with MCO P5090.2A (w/ Ch 2), Element 14, and EMS Document, and includes:

- a. The environmental policy, objectives and targets are established and approved by the E²MS Core Team and is maintained in meeting minutes by the EMS Coordinator. They are addressed through the implementation of the ECPSOP, Program Plans (Permits & Agreements), and Base Orders by the Program Managers.

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b. A description of the scope of MCBQ's EMS is provided in this manual, the MCP, ECPSOP, and Program Plans and Base Orders.

c. A description of the main elements of the EMS and their interaction, and reference to related documents is shown in Figures 5 and 6.

d. Documents and records, required for a conforming EMS are identified and maintained as indicated in MCO P5090.2A (w/ Ch 2), this manual, applicable base orders, ECPSOP, MCP, and Program Plans.

e. Documents, including records, determined by MCBQ to be necessary to ensure the effective planning, operation and control of processes that relate to the significant environmental aspects.

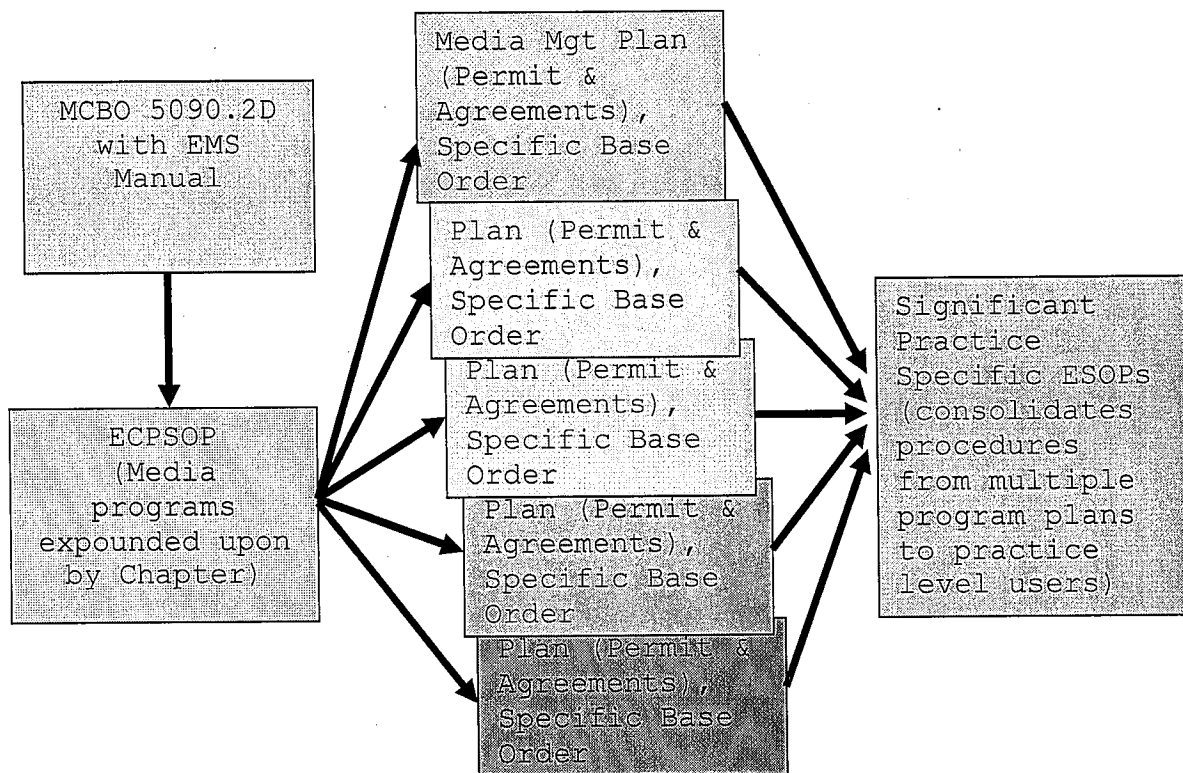


Figure 5. Interaction of EMS Documents.

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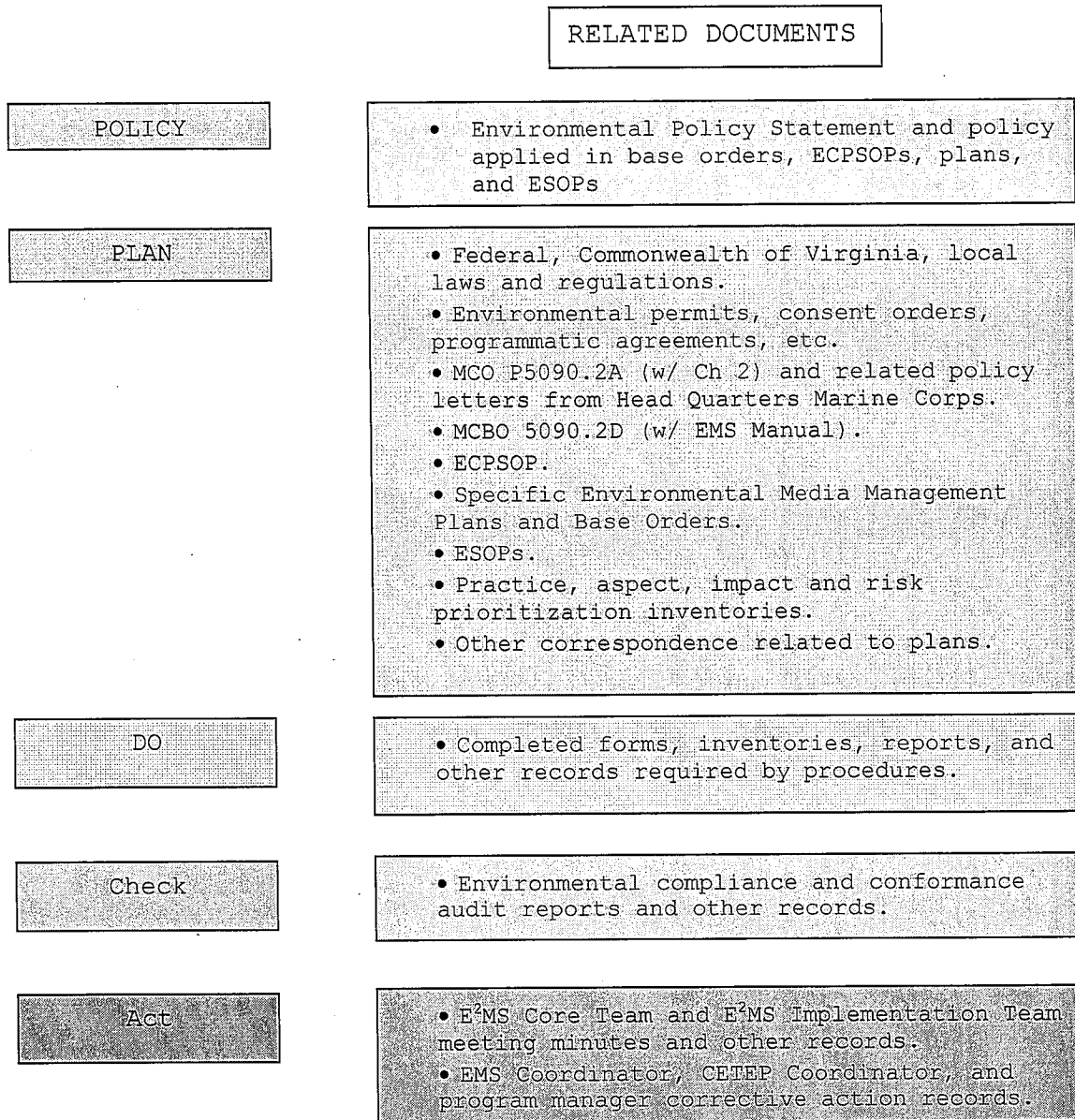


Figure 6. Interaction of EMS Documents to PDCA Methodology.

4.4.5 Control of Documents

In accordance with MCO P5090.2A (w/ Ch 2), Element 12, Document and Record Control, documents required by the EMS are controlled. Records are a special type of document and are controlled in accordance with the requirements given in Section 4.5.4.

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MCBQ has established, implemented, and maintains a procedure(s) in the MCP to:

- a. Establish, review and update as necessary and re-approve documents,
- b. Approve documents for adequacy prior to issue,
- c. Ensure that changes and the current revision status of documents are identified,
- d. Ensure that relevant versions of applicable documents are available at points of use,
- e. Ensure that documents remain legible and readily identifiable,
- f. Ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the EMS are identified and their distribution controlled, and
- g. Prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.

4.4.6 Operational Control

In accordance with MCO P5090.2A (w/ Ch 2), Element 13, Environmental SOPs, MCBQ has identified and planned those operations that are associated with identified significant environmental aspects consistent with its environmental policy, objectives and targets, in order to ensure that those operations are carried out under specified conditions, by:

- a. Establishing, implementing, and maintaining a documented procedure(s) to control situations where, in their absence, could lead to deviation from the environmental policy, objectives and targets.

- b. Describing the operating criteria in the procedure(s).

- c. Establishing, implementing and maintaining procedures related to the identified significant environmental aspects of goods and services used by the organization, and communicating applicable procedures and requirements to suppliers and contractors.

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The form for documenting the status of environmental program documents for all environmental programs addressed in the ECPSOP is provided in Appendix C. The EMS Coordinator uses the form in Appendix C to maintain an inventory of operational controls and date of last revision. This inventory is updated annually, or as needed, to reflect additions or changes to MCBQ's documented procedures. The most up to date inventory is available electronically (pdf format) in the NREA SharePoint site, Planning Department, EMS work section's, Shared Documents.

4.4.7 Emergency Preparedness and Response

In accordance with MCO P5090.2A (w/ Ch 2), Element 11, Emergency Preparedness and Response, MCBQ has established, implemented, and maintains an Integrated Spill Management Plan (ISMP). This plan identifies potential emergency situations and potential accidents that can have an impact(s) on the environment, and explains how personnel on MCBQ will respond to them. MCBQ reviews and revises these procedures regularly. Additional review and revision is implemented, after accidents or emergency situations, as appropriate.

MCBQ responds to actual emergency situations and accidents to prevent or mitigate the associated adverse environmental impacts.

In addition to the ISMP, the MCBQ EMS incorporates program aspect and /or practice specific emergency preparedness and response guidance within all EMS Documents. Such EMS documents will be reviewed periodically and, where necessary, revised.

MCBQ also periodically tests such procedures where practicable.

4.5 Checking

4.5.1 Monitoring and Measurement

In accordance with MCO P5090.2A (w/ Ch 2), Element 15, Monitoring and Measurement, environmental program managers shall establish, implement and maintain, within the ECPSOP and/or Program Plans, appropriate procedures to monitor and measure the successes and failures within each program. The type and frequency of monitoring is based on requirements identified to maintain conformance with policies and compliance with regulations applicable within the program area. Monitoring

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includes the key characteristics of program area operations that can have a significant environmental impact. The procedure(s) include the documenting of information to monitor performance, applicable operational controls and conformity with the Base's environmental objectives and targets, DoD, local Commonwealth of Virginia, and Federal requirements.

Environmental program managers ensure that calibrated or verified monitoring and measurement equipment, if required, is used and maintained for associated record retention.

4.5.2 Evaluation of Compliance and Conformance

MCO P5090.2A (w/ Ch 2), Element 17, EMS Review, and Chapter 4, established the Environmental Compliance Evaluation (ECE) Program.

4.5.2.1 Consistent with its commitment to compliance and conformance, MCBQ establishes, implements, and maintains an auditing plan for evaluating both compliance with applicable legal requirements, and conformance with applicable Federal mandates, DoD, and Base policies.

The Environmental Audit Section keeps records of the evaluation results.

4.5.2.2 MCBQ also evaluates compliance with other requirements to which the Base subscribes to, such as Interdepartmental Agreements and other letters of agreement with local agencies which may contain other environmental requirements.

The Environmental Audit Section keeps records of the results of the periodic evaluations.

4.5.3 Nonconformity, Corrective Action and Preventive Action

In accordance with MCO P5090.2A (w/ Ch 2), Chapter 4, and Element 16, Problem Solving, MCBQ has established, implemented, and maintains procedure(s) for addressing and correcting actual and potential nonconformities. The procedures also provide for taking corrective and preventive actions. MCBQ's internal and external audits assess the Base's compliance level with respect to environmental regulations and identifies actions necessary to correct deficiencies, and determine the root causes in terms of the associated USMC EMS Elements and the ISO 14001:2004 standards.

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The audit plan provides procedures that define requirements for:

- a. Identifying and correcting nonconformities and taking action(s) to mitigate their environmental impacts.
- b. Investigating nonconformities, determining their root cause(s) and taking actions in order to avoid their recurrence.
- c. Evaluating the need for action(s) to prevent nonconformities and implementing appropriate actions designed to avoid their occurrence.
- d. Recording the results of corrective and preventive action(s) taken.
- e. Reviewing the effectiveness of corrective and preventive action(s) taken.

Appropriate actions are taken in consonance with the magnitude of the problems and the environmental impacts encountered.

MCBQ ensures that, any necessary changes are made to EMS documentation; monitors corrective actions; and facilitates continual improvement.

4.5.4 Control of Records

Program Managers establish and maintain records as necessary to demonstrate conformity to the requirements of MCO P5090.2A (w/ Ch 2), Element 12, Document and Record Control; MCBQ's EMS, and applicable environmental regulations and mandates.

Procedures for the identification, storage, protection, retrieval, retention and disposal of records are addressed in the ECPSOP, MCP, and Program Plans, and Base Orders.

Records will remain legible, identifiable, and traceable at all times.

4.5.5 Internal Auditing

MCO P5090.2A (w/ Ch 2), Element 17, EMS Review, and Chapter 4, outlines the USMC guidance for performing an annual EMS self-audit as part of the ECE Program.

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4.5.5.1 The NREA Branch Environmental Audit Section, in collaboration with the NREA Branch Head and other Section Heads, shall ensure that annual audits of the EMS are planned to:

a. Determine whether the EMS

1. Complies and conforms to planned arrangements for environmental management, including the requirements of MCO P5090.2A (w/ Ch 2), and in accordance with a published MCBQ audit plan.

2. Is properly implemented and maintained.

b. Provide information on the results of annual EMS audits to management.

4.5.5.2 Audits are planned, established, implemented and maintained by MCBQ, taking into consideration the environmental importance of the operations concerned and the results of previous conformance audits.

The audit procedures are established, implemented and maintained that address:

a. The responsibilities and requirements for planning and conducting audits, reporting the results, and the retention of associated records.

b. The determination of audit criteria, scope, frequency and methods.

4.5.5.3 MCBQ accomplishes its auditing through two mechanisms:

a. An annual systematically executed self-audit program that provides a documented, objective, environmental compliance and conformance assessment. The program includes visits with every permitted site and source, every process which generates waste, or may be considered a potential source, and every activity. Guidelines and scheduling are published annually through MCBQ's Internal Audit Plan.

b. Benchmark Internal and External Environmental Compliance Evaluations (ECEs), as defined by MCO P5090.2A (w/ Ch 2), shall be executed and reported to the Base Commander and HQMC. Procedures for the ECEs are expounded upon in the MCP.

4.6 Management review

In accordance with MCO P5090.2A (w/ Ch 2), Element 18, Management Review, the E²MS Core Team shall review the EMS at planned intervals to ensure its continuing suitability, adequacy and effectiveness. Management reviews include assessing opportunities for improvement and the need for changes to the EMS, including the Base Environmental Policy and environmental objectives and targets. Unless otherwise noted, management review records will be retained indefinitely.

Input to management reviews include, but are not limited to:

- a. The results of internal conformance audits and evaluations of compliance with legal requirements and other MCBQ requirements.
- b. Communication(s) from external interested parties, including complaints.
- c. The environmental performance of MCBQ and its associated tenants and activities.
- d. The extent to which objectives and targets have been met.
- e. Status of corrective and preventive actions.
- f. Follow-up actions from previous management reviews.
- g. Changing circumstances, including developments in legal and other requirements related to MCBQ's practices and aspects.
- h. Recommendations for improvement.

Record the outputs from management reviews in meeting minutes. Include any decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the EMS consistent with the commitment to continual improvement.

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Appendix A. MCO EMS Elements vs. ISO 14001

Table A-1. Summary of EMS Elements

COMPONENT	
Element	Conformance Criteria
POLICY	
1. Environmental Policy	<ul style="list-style-type: none"> • The installation has an environmental policy statement that: <ul style="list-style-type: none"> - Is documented and signed by the installation Commander; - Reflects the vision of the Marine Corps EMS to sustain and enhance mission readiness and access to training environments through effective and efficient environmental management. - Commits to: <ul style="list-style-type: none"> • Improving MCBQ's environment • Compliance with relevant environmental legislation, regulations, and policy • Pollution prevention • Minimizing resource threats • Continual improvement in performance of the EMS • Communicating with installation personnel and make available to the public.
PLANNING	
2. Practices, Aspects, Impacts, and Risk Prioritization	<ul style="list-style-type: none"> • Practice, Aspect, Impact inventories identify and document practices aboard each installation. • The installation implements a documented procedure for identifying and documenting practices and updates the inventory as practices are altered, discontinued or added. • The installation identifies aspects and impacts associated with each practice on the inventory.

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COMPONENT	
Element	Conformance Criteria
3. Legal and Other Environmental Requirements	<ul style="list-style-type: none"> • The installation implements documented procedures to identify applicable Federal, state, local, DoD, DON, Marine Corps, and installation-level environmental requirements. • Procedures and checklists regarding requirements are disseminated as appropriate to all levels and functions operating aboard the installation.
4. Objectives, Targets, and Actions to Improve Performance	<ul style="list-style-type: none"> • The installation establishes and documents environmental objectives and targets. • The installation's objectives and targets: <ul style="list-style-type: none"> - Reflect risks to mission determined through prioritization of aspects and practices - Are consistent with and supportive of the installation's environmental policy statement and environmental requirements - Are reviewed and revised according to an installation specific schedule. • The installation institutes documented programs for tracking progress toward meeting objectives and targets.
IMPLEMENTATION	
5. Roles, Responsibilities, and Resources	The installation reviews and modifies media programs to achieve the installation's Policy, Objectives and Targets.
6. Training	<p>The installation identifies, provides, and documents training and instruction needed to:</p> <ul style="list-style-type: none"> • Comply with regulations. • Ensure personnel understand their duties under the EMS.

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COMPONENT	
Element	Conformance Criteria
7. Communication	<ul style="list-style-type: none"> • The installation implements documented procedures for internal communication among the Installation Commander, the EMS Team, the environmental office, all units and offices which own practices, and others within the Marine Corps interested in the installation's environmental affairs. • The installation implements documented procedures for receiving, recording, and responding to communications from external entities.
8. EMS Documentation	<ul style="list-style-type: none"> • The installation maintains, and the Installation Commander has approved, an EMS document that includes the installation's environmental policy statement and describes: <ul style="list-style-type: none"> - How elements relate to each other. - Where other documents and records relevant to the EMS are maintained.
9. Control of Documents	<ul style="list-style-type: none"> • The installation inventories all document requirements appropriate to its environmental programs and practices, and identifies other documents essential to the efficient operation of its EMS. • The installation implements a system to maintain documents, so that they: <ul style="list-style-type: none"> - Can be located, reviewed, and updated as necessary. - Are removed or archived, as appropriate, when obsolete.

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COMPONENT	
Element	Conformance Criteria
10. Control of Practices	<ul style="list-style-type: none"> • Environmental Standard Operating Procedures (ESOPs) constitute steps to be followed for a given practice to prevent or mitigate negative environmental impacts associated with the practice. • The installation prepares and distributes to each practice owner an ESOP for each practice under the practice owner's control. • ESOPs identify who is responsible for implementing each instruction and how often the instruction is to be carried out.
11. Emergency Preparedness and Response	<ul style="list-style-type: none"> • The installation documents its procedures for identifying and responding to accidents and emergencies and for mitigating the environmental impacts that might result. • The installation reviews and revises its emergency preparedness and response procedures when new practices are initiated and/or after the occurrence of accidents or emergencies. • Procedures to be followed in the event of an accident or emergency are communicated in scope and detail appropriate to personnel responsibilities.
CHECKING AND PREVENTIVE/CORRECTIVE ACTION	
12. Monitoring and Measurement	<ul style="list-style-type: none"> • The installation implements and initiates a compliance self-audit plan. • The installation implements methods for tracking progress toward meeting objectives and targets. • The installation monitors practices that may have a significant impact on the environment and, where appropriate, the resources that may be impacted.
13. Evaluation of Compliance	The installation annually evaluates compliance of all base operations.

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COMPONENT	
Element	Conformance Criteria
14. Problem Solving	<ul style="list-style-type: none"> • The installation follows a structured problem solving process that identifies and defines problems with compliance or the EMS; analyzes causes and alternative solutions, selects and implements actions, and follows up to ensure problems are solved. • The installation documents its problem solving efforts.
15. Control of Records	<ul style="list-style-type: none"> • The installation inventories all record requirements appropriate to its environmental programs and practices, and identifies other records essential to the efficient operation of its EMS. • The installation implements a system to maintain records, so that they: <ul style="list-style-type: none"> - Can be located. - Are protected from alterations or damage. - Are removed or archived, as appropriate, when obsolete.
16. EMS Audit	<ul style="list-style-type: none"> • The installation evaluates its EMS against the criteria listed here at appropriate intervals. • The installation supports the Headquarters, Marine Corps EMS Review conducted as part of the HQMC ECE every three years.

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COMPONENT	
Element	Conformance Criteria
MANAGEMENT REVIEW	
17. Management Review	<ul style="list-style-type: none"> • The Installation Commander designates and authorizes an EMS Team to analyze EMS implementation efforts and the results of EMS reviews. • The EMS Team takes actions that ensure the EMS is suitable to the current mission and is effective in achieving the installation's policy, objectives, and targets. • The EMS Team implements improvements to the EMS including revising the installation's EMS policy; changing procedures, projects or actions to ensure current objectives and targets are met; establishing new objectives and/or targets, or clarifying/assigning roles and responsibilities.

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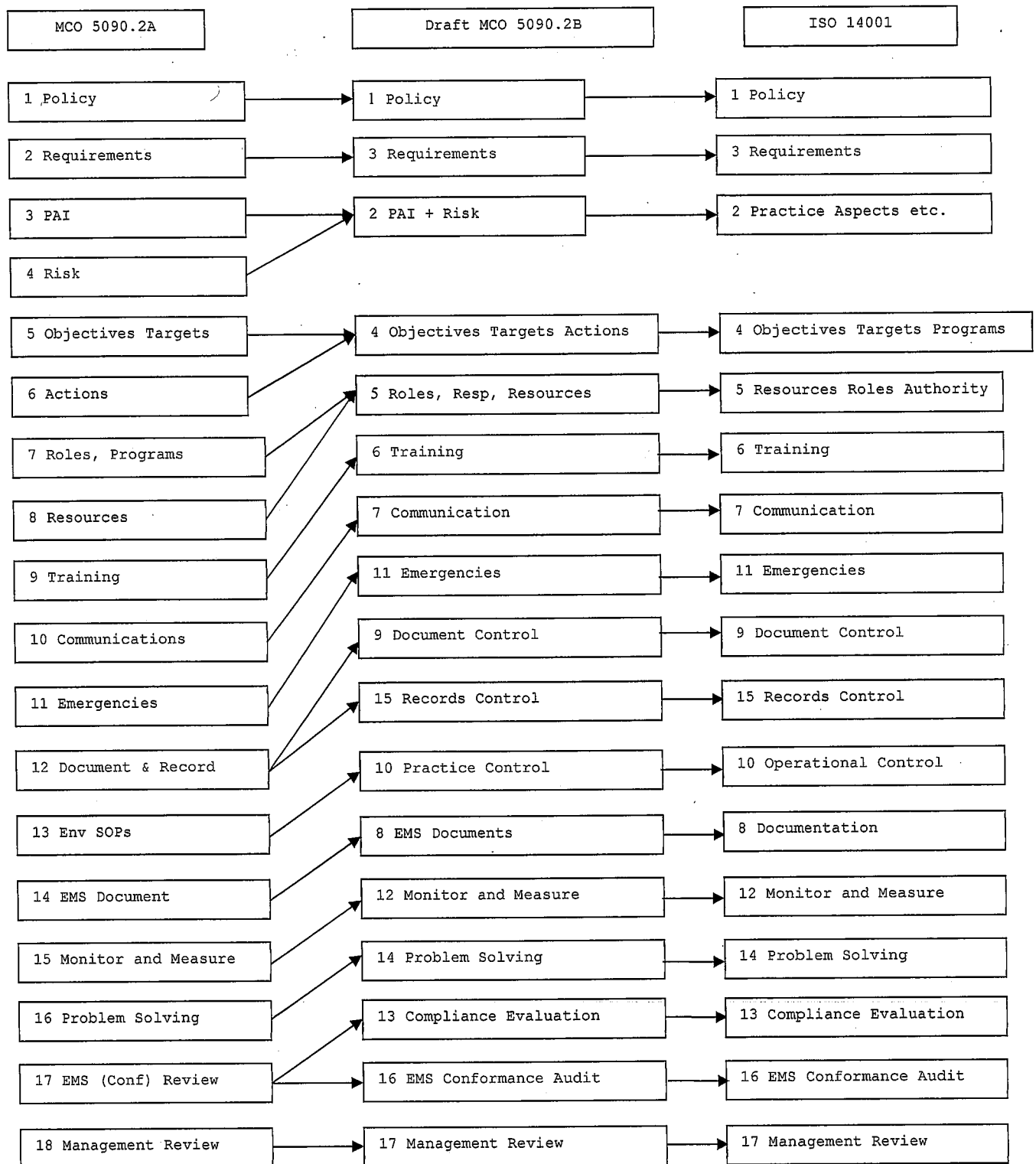


Figure A-1, Relationship between MCO P5090.2A (W/ CH 2), Draft MCO P5090.2B, and the ISO 14001:2004 standard

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Appendix B: Terms and Definitions

For the purposes of this document, the following terms and definitions apply.

Auditor: Person with the competence to conduct an audit [ISO 9000:2000, 3.9.9]

Continual improvement: Recurring process of enhancing the **environmental management system** in order to achieve improvements in overall **environmental performance** consistent with the **organization's environmental policy** (3.11)

Corrective action: Action to eliminate the cause of a detected **nonconformity**

Document: Information and its supporting medium

NOTE: 1 The medium can be paper, magnetic, electronic or optical computer disc, photograph or master sample, or a combination thereof.

NOTE: 2 Adapted from ISO 9000:2000, 3.7.2.

Environment: Surroundings in which an **organization** operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation

NOTE: Surroundings in this context extend from within an **organization** to the global system.

Environmental aspect: Element of an **organization's** activities or products or services that can interact with the **environment**

NOTE: A significant environmental aspect has or can have a **significant environmental impact**.

Environmental Compliance and Protection Standard Operating Procedures: ECPSOP

Environmental Impact: Any change to the **environment**, whether adverse or beneficial, wholly or partially resulting from an **organization's environmental aspects**

Environmental Management System: Part of an **organization's** management system used to develop and implement its **environmental policy** and manage its **environmental aspects**

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NOTE: 1 A management system is a set of interrelated elements used to establish policy and objectives and to achieve those objectives.

NOTE: 2 A management system includes organizational structure, planning activities, responsibilities, practices, **procedures**, processes and resources.

Environmental Objective: overall environmental goal, consistent with the **environmental policy**, that an **organization** sets itself to achieve

Environmental Performance: measurable results of an **organization's** management of its **environmental aspects**

NOTE: In the context of **environmental management systems**, results can be measured against the **organization's environmental policy**, **environmental objectives**, **environmental targets**, and other environmental performance requirements.

Environmental Policy: overall intentions and direction of an **organization** related to its **environmental performance** as formally expressed by top management

NOTE: The environmental policy provides a framework for action and for the setting of **environmental objectives** and **environmental targets**

Environmental Practice: Any activity conducted by an installation or its tenants in performing their mission that has an actual or potential impact on the installation's natural environment in either a positive, neutral, or negative manner.

Environmental Standard Operating Procedure: ESOP

Environmental Target: Detailed performance requirement, applicable to the **organization** or parts thereof, that arises from the **environmental objectives** and that needs to be set and met in order to achieve those objectives

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G-1: Manpower Division

G-3: Operations Division

G-4: Logistics Division

G-5: Installation and Environment Division

Interested Party: Person or group concerned with or affected by the **environmental performance** of an organization

Internal Audit: Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the **organization** are fulfilled

NOTE: In many cases, particularly in smaller organizations, independence can be demonstrated by the freedom from responsibility for the activity being audited.

Nonconformity: Non-fulfillment of a requirement

[ISO 9000:2000, 3.6.2]

Organization: Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration

NOTE: For organizations with more than one operating unit, a single operating unit may be defined as an organization.

Preventive Action: Action to eliminate the cause of a potential **nonconformity**

Prevention of Pollution: Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse **environmental impacts**

NOTE: Prevention of pollution can include source reduction or elimination, process, product or service changes, efficient use of resources, material and energy substitution, reuse, recovery, recycling, reclamation and treatment.

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Procedure: Specified way to carry out an activity or a process

NOTE 1: Procedures can be documented or not.

NOTE 2: Adapted from ISO 9000:2000, 3.4.5.

Record: Document stating results achieved or providing evidence of activities performed

NOTE: Adapted from ISO 9000:2000, 3.7.6.

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Appendix C Environmental Programs Document Status Form

Status Date:		EMS Coordinator Initials:		Page 1 of 2	
Environmental Program Area Management	ECFSOP Environmental Media Program (Chapter)	Plan / Permit / MCBO	Date Approved	Next Revision Date	Comments
NREA Branch Head	Introduction (1)				
NREA Env. Comp.					
• Air	Air (2)				
• Hazardous Materials	Hazardous Materials (3)				
	Pollution Prevention (5)				
	Radon (9)				
• Hazardous Waste	Polychlorinated Biphenyl (PCB) (8)				
	Hazardous Waste (4)				
	Military Munitions (7)				
• Solid Waste	Integrated Solid Waste (5)				
• Storage Tank	Storage Tank (12)				
	Spill Prevention and Response (10)				
• Water Program	Waste Water (13)				
	Storm Water (11)				
	Potable Water (25)				
NREA Env. Plan.					
• CETEP	CETEP (18)				
• EMS	Mgt Coordination (20)				
• National Environmental Policy Act	NEPA (22)				
• Cultural Resources	Cultural Resources (19)				

Notes: ¹ Underground Storage Tanks
² Naval Health Clinic Instruction
³ Status Colors: **Current** **Being updated** **Out of Date** **Cancel**

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Appendix C Environmental Programs Document Status Form

Status Date:		EMS Coordinator Initials:		Page 2 of 2		
Environmental Program Area Management	ECPSOP Environmental Media Program (Chapter)	Plan / Permit / MCBO	Date Approved	Next Revision Date	Comments	
• Noise	Noise Monitoring and Abatement (23)					
• Remediation	Installation Restoration (19)					
	Munitions Response (21)					
NREA Nat. Res.						
• Forestry Program	Forest Resources (17)					
•	Conservation Law Enforcement (15)					
• Fish, Wildlife, Agronomy Program	Fish, Wildlife, Agronomy (16)					
	Pesticides (6)					
• Conservation Law Enforcement						
NREA Env Audit	Compliance Enforcement (14)					
• Env Auditing						
G-5						
• Solid Waste	Integrated Solid Waste (25)					
• Energy and Water	Energy and Water (24)					
Safety Division	Asbestos Control (27)					
	Lead Safety (28)					
Naval Health Clinic	Medical and Infectious Waste (26)					
Exp Ord Disp	Explosive Ordinance Disposal (N/A)					

Notes: ¹ Underground Storage Tanks
² Naval Health Clinic Instruction
³ Status Colors: **Current** Being updated **Out of Date**
Cancel

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C-3

Enclosure (1)